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United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANTON ANDREYEVICH IAGOUNOV,

Defendants.

CASE NO. 2:24-CR-00101 DJC

UNITED STATES' FIRST AMENDED EXHIBIT
LIST

DATE: July 8, 2024
TIME: 8:30 a.m.
COURT: Hon. Daniel J. Calabretta

The United States, by and through its undersigned counsel, hereby submits the following list of exhibits it intends to introduce in its case-in-chief. The government reserves the right to supplement or modify this list with an amended list of exhibits, should the need arise.

<u>EX.</u> <u>NO.</u>	<u>DESCRIPTION</u>	<u>BATES RANGE</u> <u>("IAGOUNOV_##")</u>	<u>IDENTIFIED</u>	<u>ADMITTED</u>
1	Photograph of Building 2, 1432 Melba Drive, South Lake Tahoe	00004083		
2	Photograph of stairs and front door, Unit 202, 1432 Melba Drive, South Lake Tahoe	00004076		
3	Photograph of handwritten notes	00002573 - 00002574		

4	Photograph of A. Iagounov's bedroom.	00003462		
5	Photograph of A. Iagounov's bedroom	00003466		
6	Photograph of case containing electronic equipment from A. Iagounov's bedroom	00003574		
7	Photograph of black canvas bag containing miscellaneous items.	00003580		
8	Photograph of contents of black canvas bag.	00003582		
9	Photograph of handwritten notes and mail	00003598		
10	Photograph of miscellaneous items, including NSA folder	00003610		
11	Photograph of laptop computers and other items	00003620		
12	Photograph of bag containing gas cannisters	00003624		
13	Photograph of certificate issued to Anton Iagounov	00003634		
14	Photograph of license plates and miscellaneous items	00003638		
15	Photograph of credentials holder containing FEMA student identification: Anton Iagounov	00003642		
16	Photographs of U.S. Dept. of Homeland Security "Officer" badge holder, containing State of Nevada Private Investigators License Board Identification: Anton Iagounov	00002534 - 00002535, 00002537		
17	Photographs of U.S. Passport: Anton Iagounov	00002502, 00002505		

18	Photograph of FBI badge and miscellaneous items	00003644		
19	Photograph of plastic container holding ammunition and miscellaneous items	00003654		
20	Photograph of handwritten notes and business card	00003658		
21	Photograph of Homeland Security Legal Division Handbook	00003682		
22	Photograph of box containing FBI badge and U.S. Dept. of Homeland Security "Officer" credentials wallet	00003690		
23	Passport Renewal Application: Anton Iagounov	00002628		
24	Photograph of Visa credit card: Anton Iagounov	00003700		
25	Photograph of "Registered Executive Bodyguard" badge	00003714		
26	Photograph of plastic box containing body-worn camera and miscellaneous items	00003718		
27	FBI Receipt for Property, from 10/27/2022 search of Unit 202, 1432 Melba Ave., South Lake Tahoe, California	00002831 - 00002833		
28	GoDaddy.com business records for domain <u>usoig.us</u> (Shopper ID 28377725; Anton Iagounov)	00000389; 00000898 – 00000902		
29	FaxZero records for sender email <u>alvin.ch@proton.me</u>	00004111 – 0004124		
30	FaxZero records for sender email <u>usmcmman_00@proton.me</u>	00004131 – 00004159		

31	FaxZero records for sender email ylbpkmwxomsg@arxxwalls.com	00004125 – 00004130		
32	FaxZero records for sender email yjofwviq@candassociates.com	00004160 – 00004165		
33	May 6, 2022 eFOIA Request received by FBI from “Carson City Sheriff’s Office”	00006014 – 00006016		
34	May 6, 2022 eFOIA Request PDF file from “Carson City Sheriff’s Office” (retrieved by search of Iagounov’s computer) f/n: foia_fbi_furlong.pdf	00006017 – 00006019		
35	May 11, 2022 email thread Re: “FOIA 1544822-0”	00006008 – 00006009		
36	May 18, 2022 email thread Re “Records Request from Carson City Sheriff”	00006010 – 00006013		
37	July 24, 2022 email re: “FW: Re: Russian threat of asynchronous terrorist-attacks domestically”	00004900 – 0004905		
38	Missing Person’s report pertaining to Anton Iagounov, filed October 28, 2022	00004728 – 00004733		
39	Affidavit for Criminal Complaint, <i>United States v.</i> <i>Alexander Yuk Ching Ma</i> , Case No. 1:20-mj-01016-DKW-RT (Aug. 13, 2020, D. Hi.); ECF No. 1 (incl. forensic report)	00005409 – 00005437		
40	Draft of search warrant affidavit: 06/19/2022 (incl. forensic report) f/n: electronic-device-search- warrant.pdf	00005473 – 00005503		

41	Image of signature: “Joel Q. O’Neill” (incl. forensic report)	0005671 – 00005675		
42	Draft of search warrant affidavit: 06/27/2022 (incl. forensic report) f/n: Electronic Device Search Warrant.pdf	00005438 – 00005472		
43	Text file (incl. forensic report) f/n: hughes.txt	00005612 – 00005641		
44	Forensic Examination Reports of Web Browser Activity and Searches: June – August 2022	00005909 – 00005997 (Select pages)		
45	Forensic Examination Reports of Searches and Login Activity related to “Proton Mail” website	00006001 – 00006007		
46	Computer Forensic Examination Report for Item #1B63 (Lenovo Laptop Computer)	00003298		
47	Stipulation of Testimony of Trial Witness: Alvin Chang	ECF No. 25		
48	Stipulation of Testimony of Trial Witness: Hon. Beryl Howell	ECF No. 26		
49	Lenovo Laptop Computer, s/n: MP18EAS7 (Item #1B63)	n/a		
50	RESERVED			
51	Audio clip of Interview of A. Iagounov, 10/27/2022	00006108		
51A	Transcript of audio clip of Interview of A. Iagounov, 10/27/2022	00006129 – 00006130		
52	Audio clip of Interview of A. Iagounov, 10/27/2022	00006109		

52A	Transcript of audio clip of Interview of A. Iagounov, 10/27/2022	00006131 – 00006132		
53	Audio clip of Interview of A. Iagounov, 10/27/2022	00006110		
53A	Transcript of audio clip of Interview of A. Iagounov, 10/27/2022	00006133		
54	Audio clip of Interview of A. Iagounov, 10/27/2022	00006111		
54A	Transcript of audio clip of Interview of A. Iagounov, 10/27/2022	00006314 – 00006135		
55	Audio clip of Interview of A. Iagounov, 10/27/2022	00006112		
55A	Transcript of audio clip of Interview of A. Iagounov, 10/27/2022	00006136		
56	Audio clip of Interview of A. Iagounov, 10/27/2022	00006113		
56A	Transcript of audio clip of Interview of A. Iagounov, 10/27/2022	00006137 – 00006140		
57	Audio clip of Interview of A. Iagounov, 10/27/2022	00006114		
57A	Transcript of audio clip of Interview of A. Iagounov, 10/27/2022	00006141		
58	Audio clip of Interview of A. Iagounov, 10/27/2022	00006115		
58A	Transcript of audio clip of Interview of A. Iagounov, 10/27/2022	00006142		
59	Audio clip of Interview of A. Iagounov, 10/27/2022	00006116		

59A	Transcript of audio clip of Interview of A. Iagounov, 10/27/2022	00006143		
60	Audio clip of Interview of A. Iagounov, 10/27/2022	00006117		
60A	Transcript of audio clip of Interview of A. Iagounov, 10/27/2022	00006144		
61	Audio clip of Interview of A. Iagounov, 10/27/2022	00006118		
61A	Transcript of audio clip of Interview of A. Iagounov, 10/27/2022	00006145 - 00006146		
100	July 6, 2022 thread “Re: leaked DC court document,” search warrant affidavit attached Att. f/n: 20220704.pdf	00001838 – 00001879		
101	United States Capitol Police contact information (from USCP website)	00005193 – 00005194		
102	Image of signature: “Beryl Howell” (incl. forensic report) f/n: image3.png	00005648 – 00005652		
103	Draft search warrant affidavit (DDC): 07/04/2022 (incl. forensic report) f/n: Search_Warrant_DC.pdf	00005724 – 00005768		
104	Draft search warrant affidavit (DDC): 07/04/2022 (incl. forensic report) f/n: Search_Warrant_DC_unsigned.pdf	00005769 – 00005812		

105	Draft search warrant affidavit (DDC): 07/04/2022 (incl. forensic report) f/n: 20220704.pdf	00006064 – 00006107		
106	Website (printed) of “The Guardian US editorial team” (incl. forensic report) f/n: guardian_contacts.pdf	00005595 – 00005611		
107	Text of online tip, including contact information for “Alvin Chang” and text of tip (incl. forensic report) f/n: dc_police.odt	00005401 – 00005406		
200	July 11, 2022 email thread from service-processing@usoig.us , “Re: emergency filing/#KYUSA0300,” with search warrant affidavit attached Att. f/n: 20220711.pdf	00000144 – 00000188		
201	Draft search warrant affidavit (CDCA): 07/11/2022 (incl. forensic report) f/n: 20220711.pdf	00005357 – 00005400		
300	July 21, 2022 email thread from service-processing@usoig.us , “FW: Re: #KYUSA0300,” with search warrant affidavit attached Att. f/n: Search Warrant_GA_unsigned.pdf	00001695 – 00001739		
301	Draft search warrant affidavit (MDGA): 07/21/2022 (incl. forensic report) f/n: Search Warrant_GA_unsigned.pdf	00005853 – 00005896		

400	July 26, 2022 email thread from <u>NIPTfaxe@ao.uscourts.gov</u> , Re: “Fax Received from CSID: FaxZero.com,” with 4-page electronic facsimile from “Timothy Metz, NASA-OIG,” attached	00006127, 00006128, 00006120 – 00006123		
401	July 15, 2022 email thread from <u>service-processing@usoig.us</u> , “FW: #KYUSA0300,” with search warrant affidavit attached Att. f/n: 07152022.pdf	00005195 – 00005238		
402	Draft search warrant affidavit (NDFL): 07/15/2022 (incl. forensic report) f/n: 07152022.pdf	00006020 – 00006063		
403	Letter from “Bob O.”, Re: Russian threat of asynchronous terrorist attacks domestically,” attached 2-page handwritten letter (incl. forensic report) f/n: russian_threat.pdf	00005717 – 00005723		
404	Notes, including letter from “Bob O.” and drafts of letter re submission of search warrants (incl. forensic report) f/n: kaboom.odt	00005681 – 00005693		

Dated: July 5, 2024

PHILLIP A. TALBERT
United States Attorney

By: /s/ JAMES R. CONOLLY
JAMES R. CONOLLY
Assistant United States Attorney